

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 15-cv-14060

v.

Hon. Sean F. Cox  
United States District Judge

PARKSIDE EAST, INC.;  
HOLT MANOR, INC.;  
KELLY MANOR, INC.; and  
SUDI HOPPER,

Stephanie Dawkins Davis  
United States Magistrate Judge

Defendants.

---

**JOINT MOTION FOR ENTRY OF PROPOSED CONSENT ORDER**

For the reasons set forth in the attached Memorandum, the parties in this matter jointly move for entry of the attached proposed Consent Order.

*For the United States:*

BARBARA L. McQUADE  
United States Attorney  
Eastern District of Michigan

VANITA GUPTA  
Principal Deputy Assistant  
Attorney General  
Civil Rights Division

/s/ Sarah Karpinen  
SARAH KARPINEN, P63289  
Assistant United States Attorney  
211 W. Fort Street  
Suite 2001  
Detroit, Michigan 48226  
(313) 226-9595  
[Sarah.Karpinen@usdoj.gov](mailto:Sarah.Karpinen@usdoj.gov)

/s/ Nancy F. Langworthy  
SAMEENA SHINA MAJEED  
Chief  
TIMOTHY J. MORAN  
Deputy Chief  
NANCY F. LANGWORTHY  
Trial Attorney  
Housing and Civil Enforcement  
Section  
Civil Rights Division  
United States Department of Justice  
950 Pennsylvania Ave. NW  
Washington, D.C. 20530  
(202) 616-8925  
[Nancy.Langworthy@usdoj.gov](mailto:Nancy.Langworthy@usdoj.gov)

PATRICK A. MILES, JR.  
United States Attorney  
/s/ Francesca Ferguson  
W. FRANCESCA FERGUSON, P30440  
Assistant United States Attorney  
Post Office Box 208  
Grand Rapids, Michigan 49501-0208  
(616) 456-2404, ext. 12020  
[Francesca.Ferguson@usdoj.gov](mailto:Francesca.Ferguson@usdoj.gov)

*For Defendants:*

/s/ Joseph Falcone (with consent)  
JOSEPH FALCONE, ESQ.  
3000 Town Center, Suite 2370  
Southfield, MI 48075  
(248) 357-6613  
[jf@lawyer.com](mailto:jf@lawyer.com)

Dated: August 30, 2016

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 15-cv-14060

v.

Hon. Sean F. Cox  
United States District Judge

PARKSIDE EAST, INC.;  
HOLT MANOR, INC.;  
KELLY MANOR, INC.; and  
SUDI HOPPER,

Stephanie Dawkins Davis  
United States Magistrate Judge

Defendants.

---

**MEMORANDUM IN SUPPORT OF**  
**JOINT MOTION FOR ENTRY OF PROPOSED CONSENT ORDER**

On November 19, 2015, the United States filed a Complaint against Parkside East, Inc., Holt Manor, Inc., Kelly Manor, Inc. and Sudi Hopper (collectively “Defendants”), alleging that Defendants violated the Fair Housing Act, 42 U.S.C. §§ 3601-3619, by engaging in housing practices that discriminate on the basis of familial status. The Complaint alleged that Defendants refused to negotiate for the rental of, or otherwise made unavailable one bedroom units to prospective renters with children, in violation of 42 U.S.C. § 3604(a); discriminated against persons in the terms, conditions or privileges of rental of a dwelling because of familial status, in violation of 42 U.S.C. § 3604(b); and made statements with respect to the rental

of a dwelling that indicate a preference, limitation or discrimination based on familial status, in violation of 42 U.S.C. § 3604(c).

After participating in discovery, the parties agreed to resolve their dispute under the terms set forth in the proposed Consent Order, attached to this motion as Exhibit A. The proposed Consent Order is fair, adequate, and reasonable, and consistent with the public interest. See *United States v. Lexington-Fayette Urban County Government*, 591 F.3d 484, 489 (6th Cir. 2010) (holding that the criteria for reviewing a consent decree is whether it is “fair, adequate, and reasonable, as well as consistent with the public interest.” (internal quotations omitted)).

Each term within the proposed Consent Order is necessary and appropriate to achieve the parties’ purpose, and is consistent with the Fair Housing Act, which provides the statutory basis for the United States’ suit in this matter. The parties, both of whom are represented by informed and competent counsel, have deemed the terms of the proposed Consent Order to be fair, adequate, and reasonable, and thereby jointly desire to resolve this matter in this way.

Respectfully submitted,

*For the United States:*

BARBARA L. McQUADE  
United States Attorney  
Eastern District of Michigan

VANITA GUPTA  
Principal Deputy Assistant  
Attorney General  
Civil Rights Division

/s/ Sarah Karpinen  
SARAH KARPINEN, P63289  
Assistant United States Attorney  
211 W. Fort Street  
Suite 2001  
Detroit, Michigan 48226  
(313) 226-9595  
[Sarah.Karpinen@usdoj.gov](mailto:Sarah.Karpinen@usdoj.gov)

/s/ Nancy F. Langworthy  
SAMEENA SHINA MAJEED  
Chief  
TIMOTHY J. MORAN  
Deputy Chief  
NANCY F. LANGWORTHY  
Trial Attorney  
Housing and Civil Enforcement  
Section  
Civil Rights Division  
United States Department of Justice  
950 Pennsylvania Ave. NW  
Washington, D.C. 20530  
(202) 616-8925  
[Nancy.Langworthy@usdoj.gov](mailto:Nancy.Langworthy@usdoj.gov)

PATRICK A. MILES, JR.  
United States Attorney  
/s/ Francesca Ferguson  
W. FRANCESCA FERGUSON, P30440  
Assistant United States Attorney  
Post Office Box 208  
Grand Rapids, Michigan 49501-0208  
(616) 456-2404, ext. 12020  
[Francesca.Ferguson@usdoj.gov](mailto:Francesca.Ferguson@usdoj.gov)

*For Defendants:*

/s/ Joseph Falcone (with consent)  
JOSEPH FALCONE, ESQ.  
3000 Town Center, Suite 2370  
Southfield, MI 48075  
(248) 357-6613  
[jf@lawyer.com](mailto:jf@lawyer.com)

Dated: August 30, 2016

**CERTIFICATION OF SERVICE**

I hereby certify that on August 30, 2016, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to all counsel of record.

/s/ Sarah Karpinen

SARAH KARPINEN (P63289)

Assistant United States Attorney

211 W. Fort Street, Suite 2001

Detroit, Michigan 48226

(313) 226-9595

sarah.karpinen@usdoj.gov